

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DEBORAH LAUFER,
Plaintiff,

v.

J & J EXECUTIVE SUITES, LLC,
Defendant.

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CASE NO. 6:20-CV-00385-ADA-JCM

RULE 26 (a)(1) DISCLOSURES

Now Comes Defendant, J & J Executive Suites, LLC., by and through its attorney, and respectfully submits its Rule 26 (a)(1) Disclosures.

Respectfully submitted,

MICHAEL, BEATTY & ALCOZER, LP



JAY R. BEATTY

STATE BAR NO.: 01992450

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BUILDING D, SUITE 401

KILLEEN, TEXAS 76542

TELEPHONE: (254) 526-3024

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ATTORNEY FOR DEFENDANT

J & J EXECUTIVE SUITES, LLC.

CERTIFICATE OF SERVICE

I certify that on this the 31 day of July 2020, a true and correct copy of the foregoing document has been forwarded to all parties of record by:

- | | | | |
|-------------------------------------|---|--------------------------|---|
| <input type="checkbox"/> | Certified Mail,
Return Receipt Requested | <input type="checkbox"/> | Telephonic transfer to recipient's current
telecopier number |
| <input type="checkbox"/> | US Regular Mail | <input type="checkbox"/> | Hand Delivery |
| <input type="checkbox"/> | US Express Mail | <input type="checkbox"/> | Federal Express |
| <input checked="" type="checkbox"/> | E-Mail/E-File | | |

**Tristan W. Gillespie, Esq.
Thomas B. Bacon, P.A.
5150 Cottage Farm Rd.
Johns Cree, GA 30022**

Via email only to: gillespie.tristan@gmail.com



JAY R. BEATTY

RULE 26 (a)(1) DISCLOSURES

In General. Exempt as exempted by Rule 26(a)(1)(B) or as otherwise stipulated or ordered by the court, a party must, without awaiting a discovery request, provide to the other Parties:

i.) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

Answer: CHRIS LEE
By and through his Attorney
Jay R. Beatty
Michalk, Beatty & Alcozer, L.P.
3106 South W. S. Young Drive
Building D, Suite 401
Killeen, Texas 76542
Telephone: (254) 526-3024
Facsimile: (254) 526-2545
jbeatty@mbaattorneys.com
Mr. Lee is the managing member of Defendant J&J Executive Suites.
Mr. Lee has knowledge of the property in question.

Donna Kim
Realative of Chris Lee
Prior Owner of the Property
Knows that the building was built in 1974. They never had any
handicapped rooms. She also has knowledge concerning the property in
question.

Jay R. Beatty
Michalk, Beatty & Alcozer, L.P.
3106 South W. S. Young Drive
Building D, Suite 401
Killeen, Texas 76542
Telephone: (254) 526-3024
Facsimile: (254) 526-2545
Mr. Beatty will testify to the reasonable and necessary
attorneys' fees and expenses incurred in bringing this suit. He is expected
to testify that \$300.00 per hour is a reasonable fee for the services
provided in this matter. Please see resume attached hereto, marked
Exhibit "A," and incorporated by this reference.

ii.) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody ,

or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

Answer: Defendant has no documentation. This answer will be supplemented if necessary.

iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

Answer: Attorney's fees at \$300 per hour. This answer will be supplemented.

iv.) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment..

Answer: There is no insurance which is applicable.